

# EXHIBIT A



**SUBJECT TO ATTORNEY-CLIENT PRIVILEGE  
AND ATTORNEY WORK PRODUCT**

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## INVOICE

Ad Hoc Group of Celsius Earn Account Holders

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Fees	\$326,262.00
<b>Invoice Total</b>	<b>\$326,262.00</b>

[Details on following page]

## INVOICE DETAILS

### DETAIL OF CURRENT CHARGES

<u>Date</u>	<u>Services</u>	<u>Timekeeper</u>	<u>Rate</u>	<u>Hours</u>	<u>Amount</u>
4/7/2023	Review proposed ad hoc structure and proposed by laws Organizational call (1.0); follow up re chair and discuss structure and bylaws (1.0)	Kuhns, Joyce A.	\$530/hr	1	\$530.00
4/10/2023	Call with Celsius ad hoc group of EARN account holders	Kuhns, Joyce A.	\$530/hr	2	\$1,060.00
4/10/2023	Call and emails re engagement letter and signatories (1.0); draft NDA and finalize byLaws (1.0)	Nagi, Jason A.	\$550/hr	1	\$550.00
4/11/2023	Call with I. Hermann and Steering Committee (1.0); further revise NDA and bylaws (1.0); confirm wiring instructions and steering committee members and addresses for Rule 2019 (1.0)	Kuhns, Joyce A.	\$530/hr	2	\$1,060.00
4/12/2023	Review draft bylaws	Kuhns, Joyce A.	\$530/hr	3	\$1,590.00
4/12/2023	Call with I. Hermann re open issues, class claim, and his call with K&E re same (1.0); revise NDA (.5)	Nagi, Jason A.	\$550/hr	0.8	\$440.00
4/13/2023	Call with I. Hermann re NDA, byLaws, timing of entry of appearance; discuss 4/18 docket (1.2); review docket re same (.3); review case management order (.5)	Kuhns, Joyce A.	\$530/hr	1.5	\$795.00
4/14/2023	Call with I. Hermann; call with Ad Hoc re organizational issues and goals and connecting with UCC and K&E (1.5); review items on omni agenda (.5)	Kuhns, Joyce A.	\$530/hr	2	\$1,060.00
4/17/2023	File entry of appearance (.2); draft and edit Rule 2019 statement (1.0); review bid objections (.8)	Kuhns, Joyce A.	\$530/hr	2	\$1,060.00
4/17/2023	Consider issues to be addressed at tomorrow's hearing and agenda re same (.5); emails with counsel for UCC (.1); review notice of appearance and pro hac vice application of J. Kuhns (.2) and file appearance request (.1). Attend Celsius omni hearing (1.5); follow on with I. Hermann re same (1.0); emails with prospects (.5); review prospects from Nick Farr (.2); emails with UCC counsel and K&E to set up time to talk (.3)	Kuhns, Joyce A.	\$530/hr	2	\$1,060.00
4/18/2023	Prepare for and make limited appearance in first omnibus hearing on behalf of Ad Hoc Earn Group	Nagi, Jason A.	\$550/hr	0.9	\$495.00
4/18/2023	Replies to prospects (1.0); consult with I. Hermann re same (.3); review appeal and answer questions for Ad Hoc re same (.2)	Kuhns, Joyce A.	\$530/hr	3.5	\$1,855.00
4/19/2023	Pre-call with I. Hermann (.3); call with Ad Hoc Steering Committee and UCC counsel re issues (.7); follow on emails with group re same (.5)	Nagi, Jason A.	\$550/hr	1.5	\$825.00
4/20/2023	Call with I. Hermann (1.0); NDA's with D. Latona (.5)	Kuhns, Joyce A.	\$530/hr	1.5	\$795.00
4/21/2023	Attend organizational matters for Celsius Ad Hoc review (.8); emails with Kirkland re auction protocols (.2)	Kuhns, Joyce A.	\$530/hr	1.5	\$795.00
4/24/2023	Attend Steering Committee call re auction (1.0); emails re observers and funding (.3); attend auction (2.7)	Kuhns, Joyce A.	\$530/hr	1	\$530.00
4/25/2023	Revise and submit advisor NDA to K&E (.3); revise and circulate docusign versions for steering committee members (.3); call with J. Nagi re auction status (.2); call with steering committee re same (.5); attend auction (3.5); review appellate designations with I. Hermann to avoid conflicts (.2)	Kuhns, Joyce A.	\$530/hr	4	\$2,120.00
4/26/2023	Work on Rule 2019 statement and categories (1.0); emails with proposed members re same (.3); redraft and circulate Kirkland NDA for steering committee members (.3); attend auction (2.4)	Kuhns, Joyce A.	\$530/hr	5	\$2,650.00
4/27/2023	Attend auction (1.0); call with I. Hermann re Rule 2019 statement/exhibits (.3); review and revise and forward for filing (.3); review bid procedures and all pending adversaries (2.4)	Kuhns, Joyce A.	\$530/hr	4	\$2,120.00
4/28/2023	Review 2019 Statement in advance of filing	Nagi, Jason A.	\$550/hr	4	\$2,200.00
4/28/2023	Attend Celsius auction (6.0); emails to group re NDA (.3); confirm receipt of all NDA's to Kirkland (.2)	Nagi, Jason A.	\$550/hr	0.5	\$275.00
5/1/2023	Attend auction (4.0); review class POC and errata (.3); emails with Dr. Lisa Lang re rejoining ad hoc (.3); emails and call with M. Danenhower re same (.4); review UCC conflict issue (.3)	Kuhns, Joyce A.	\$530/hr	6.5	\$3,445.00
5/2/2023		Kuhns, Joyce A.	\$530/hr	5	\$2,650.00

<u>Date</u>	<u>Services</u>	<u>Timekeeper</u>	<u>Rate</u>	<u>Hours</u>	<u>Amount</u>
5/2/2023	Consider effect of denial of appeal and its connection with plan and disclosure statement objections (.4); potential need to appeal adverse ruling, issue of mootness (.2)	Nagi, Jason A.	\$550/hr	0.6	\$330.00
5/3/2023	Attend Celsius auction (4.0); draft and submit ad hoc questions/concerns to UCC (1.0)	Kuhns, Joyce A.	\$530/hr	5	\$2,650.00
5/4/2023	Status call with I. Hermann (1.0); resume and exit auction (1.5); review recent filings re same (.5)	Kuhns, Joyce A.	\$530/hr	3	\$1,590.00
5/5/2023	Call with J. Nagi re discontinuation of auction (.3); call with I. Hermann re status call and agenda for 5/8 for steering committee (.7)	Kuhns, Joyce A.	\$530/hr	1	\$530.00
5/8/2023	Review agenda (.3); attend steering committee call (.8); email to Kirkland and White and Case re Disclosure Statement deadline and call re status (.3); attend auction (3.6)	Kuhns, Joyce A.	\$530/hr	5	\$2,650.00
5/8/2023	Call with I. Hermann, B. Perry, N. Farr and J. Kuhns concerning plan issues, sale issues, ad hoc group screening and press as they relate to legal issues in the case.	Nagi, Jason A.	\$550/hr	0.8	\$440.00
5/9/2023	Attend call with K&E and White and Case (1.0); email to steering committee re same (.5); attend auction; review and share auction notes (4.5)	Kuhns, Joyce A.	\$530/hr	6	\$3,180.00
5/11/2023	Review and reply to I. Hermann emails re claims issues (.5); emails to group re funding (.5); review status if all litigation and possible adversary (1.0)	Kuhns, Joyce A.	\$530/hr	2	\$1,060.00
5/12/2023	Emails with Kirkland re auction resumption (.2); email to White and Case re time to talk Monday re litigation (.2)	Kuhns, Joyce A.	\$530/hr	0.4	\$212.00
5/15/2023	Review I. Hermann emails re status of customer claims (.6); call with S. Hershey re customer claims (.6)	Kuhns, Joyce A.	\$530/hr	1.2	\$636.00
5/16/2023	Review and comment on I. Hermann response re stay/vacature and narrowing scope	Kuhns, Joyce A.	\$530/hr	0.5	\$265.00
5/17/2023	Review emails from I. Hermann and reply re appeal and motion for stay (.2); call from I. Hermann re service (.2)	Kuhns, Joyce A.	\$530/hr	0.4	\$212.00
5/17/2023	Attend Omnibus hearing (1.1); call with J. Kuhns concerning hearing (.4). Call with Steering Committee re general status (.5); emails with R. Gallagher re NDA and joining group and counsel (.5); attend continued auction (.5)	Nagi, Jason A.	\$550/hr	1.5	\$825.00
5/19/2023	Attend conclusion of auction and email re results	Kuhns, Joyce A.	\$530/hr	1.5	\$795.00
5/24/2023	Review and forward forward term sheet to Steering Committee (.6); call with I. Hermann re same and next steps (.4)	Kuhns, Joyce A.	\$530/hr	1	\$530.00
5/25/2023	Emails with I. Hermann re auction (.2); continue review of individual adversary proceedings (.4); confirm pre-Kirkland call with Steering Committee (.2); confirm call with Kirkland/D. Latona (.2)	Kuhns, Joyce A.	\$530/hr	1	\$530.00
5/26/2023	Call with Earn Steering Committee re outreach to B. Perry and next steps (2.0); prep for and attend call with Kirkland and White and Case re same (1.5); emails with Steering Committee re same (.5); call with I. Hermann re appeal issues and record (1.0); review docket and declarations relating to customer causes of action (1.0)	Kuhns, Joyce A.	\$530/hr	6	\$3,180.00
5/30/2023	Call with Ad Hoc group of borrowers (1.0); telephone call with counsel for debtor and UCC (.5).	Nagi, Jason A.	\$550/hr	1.5	\$825.00
5/30/2023	Emails with S. Hershey re participation in depositions and scheduling order re consumer litigation (.1); follow up with potential ad hoc member (.4); review emails and call with I. Hermann re appeal and timing issues to avoid conflicts (1.0)	Kuhns, Joyce A.	\$530/hr	1.5	\$795.00
5/31/2023	Review scheduling order (.4); send request re production to S. Hershey (.2); review and revise email from Brett to Fahrenheit/A. Genout and M. Arrington (.4)	Kuhns, Joyce A.	\$530/hr	1	\$530.00
6/1/2023	Review notices of depositions for UCC litigation (1.0); forward lists and dates to Steering Committee (.2); emails with S. Hershey re objections to UCC discovery (.3); email to S. Hershey requesting call on 6/5 re depositions (.2); email to Steering Committee for intel on deponents (.5); review Celsius objections to admissions, interrogatories and RPD (1.3)	Kuhns, Joyce A.	\$530/hr	3.5	\$1,855.00

<u>Date</u>	<u>Services</u>	<u>Timekeeper</u>	<u>Rate</u>	<u>Hours</u>	<u>Amount</u>
6/5/2023	Call with S. Hershey re discovery and status of UCC complaints (.7); emails with Steering Committee and D. Frishberg re loan versus earn treatment (1.0); review Debtor objections to discovery (1.3)	Kuhns, Joyce A.	\$530/hr	3	\$1,590.00
6/6/2023	Emails re protective order signatures for Debtor and Preferred counsel (.3); attend discovery hearing with J. Glenn (1.0); preliminary document review from UCC email with preferred re depo schedule (1.7)	Kuhns, Joyce A.	\$530/hr	3	\$1,590.00
6/7/2023	Review plan sponsor agreement and compare to plan (1.2); email to Steering Committee re loan plan treatment on liquidation (1.5); email to Celsius group re depo access and production (.3)	Kuhns, Joyce A.	\$530/hr	3	\$1,590.00
6/8/2023	Forward Sponsor Agreement and Plan to Steering Committee (.1); attend Steering Committee call re treatment and outreach to Debtor, UCC and Fahrenheit (1.5); email to Fahrenheit lawyer and reply re same (.1); email to Debtor and UCC re call with Fahrenheit (.2); forward email re depo schedule to update chart (.2); request link for 6/9/23 (.2); forward requested signed PO joinder to Milbank (.2); call with I. Hermann and D. Frishberg re attendance at certain select depositions (.5)	Kuhns, Joyce A.	\$530/hr	3	\$1,590.00
6/8/2023	Review specific sections of plan milestones.	Nagi, Jason A.	\$550/hr	0.3	\$165.00
6/8/2023	Call with Steering Committee.	Nagi, Jason A.	\$550/hr	1.5	\$825.00
6/9/2023	Attend Celsius depositions re Tang and Reiman (5.4); emails with lawyers re next depositions and document productions (.3); emails with B. Perry re plan provisions re liquidating trust (.3)	Kuhns, Joyce A.	\$530/hr	6	\$3,180.00
6/12/2023	Attend depositions (3.9); emails with litigation team re next round (.2); email to Steering Committee re status call re depo (.4)	Kuhns, Joyce A.	\$530/hr	4.5	\$2,385.00
6/13/2023	Attend Steering Committee call to discuss next steps	Kuhns, Joyce A.	\$530/hr	1.2	\$636.00
6/14/2023	Call with Debtor, Fahrenheit, and UCC re open issues (.7); draft and send summary to Steering Committee (.8)	Kuhns, Joyce A.	\$530/hr	1.5	\$795.00
6/15/2023	Review Motion to Extend Exclusivity to solicit acceptances of plan and request for mediation (.5); emails to Kirkland re call to discuss Earn versus Loan treatment (.3); status email to Steering Committee (.4); email to B. Perry re soliciting another top 50 for Earn (.3)	Kuhns, Joyce A.	\$530/hr	1.5	\$795.00
6/16/2023	Emails with Debtor and UCC re call re positioning (.5); emails re possible mediators (.3); review transcripts (1.2); outline position for Debtor call (1.0)	Kuhns, Joyce A.	\$530/hr	3	\$1,590.00
6/19/2023	Emails re mediator (.3); review disclosure documents (1.7)	Kuhns, Joyce A.	\$530/hr	2	\$1,060.00
6/20/2023	Call with I. Hermann re mediation (.2); call with D. Frishberg re extracts for mediation (.4); review documents and emails for mediation (1.0); set up call with counsel for Debtor and UCC and Fahrenheit (.2); emails re selection of mediator (.2)	Kuhns, Joyce A.	\$530/hr	2	\$1,060.00
6/21/2023	Review emails from Steering Committee re positions (1.0); review Borrower exclusivity objection and UCC statement (.5); email and call with I. Hermann re reasons not to object (.3); emails with lawyers re mediator choices (.2)	Kuhns, Joyce A.	\$530/hr	2	\$1,060.00
6/22/2023	Email with earn account holders re status (.7); set up Friday Ad Hoc status call (.1); emails with lawyers re possible mediators (.2)	Kuhns, Joyce A.	\$530/hr	1	\$530.00
6/26/2023	Status call with Steering Committee and updates with debtor re mediation schedule	Kuhns, Joyce A.	\$530/hr	1.2	\$636.00
6/27/2023	Document and pleadings review for Celsius 6/28 omni hearing	Kuhns, Joyce A.	\$530/hr	0.5	\$265.00
6/28/2023	Attend Celsius Omnibus hearing (1.5); follow on with I. Hermann re appeal issues (.5); review Plan treatment of ad hoc groups (1.0)	Kuhns, Joyce A.	\$530/hr	3	\$1,590.00
7/3/2023	Emails with I. Hermann and D. Frishberg re settlement and appeal (1.0); Celsius update call (1.0); review hearing transcript and Disclosure Statement call (1.0); call with J. Nagi, I. Hermann and D. Frishberg re mediation (1.0)	Kuhns, Joyce A.	\$530/hr	4	\$2,120.00
7/3/2023	Call with J. Kuhns concerning CEL token holders and plan treatment.	Nagi, Jason A.	\$550/hr	0.4	\$220.00
7/3/2023	Call with I. Hermann, J. Kuhns and D. Frishberg concerning upcoming mediation.	Nagi, Jason A.	\$550/hr	1.6	\$880.00

<u>Date</u>	<u>Services</u>	<u>Timekeeper</u>	<u>Rate</u>	<u>Hours</u>	<u>Amount</u>
7/5/2023	Call and emails with I. Hermann a re appeal and settlement issues (1.0); review settlement re releases and scope and substantive consolidation (1.4); call with UCC counsel and Debtor counsel re same and follow on email (.6); email to Steering Committee confirming mediation schedule and statements (.5); compile docket review for mediation statement (1.5)	Kuhns, Joyce A.	\$530/hr	5	\$2,650.00
7/5/2023	Call with J. Kuhns concerning mediation (.2); call with J. Kuhns concerning effect of proposed settlement with preferred on Earn Ad Hoc group on bankruptcy case (.4); call with counsel to debtor and UCC concerning preferred settlement and upcoming mediation (.6).	Nagi, Jason A.	\$550/hr	1.2	\$660.00
7/6/2023	Continue review of documents and pleadings and transcripts (4.0); emails with I. Hermann re appeal issues and settlement (1.0)	Kuhns, Joyce A.	\$530/hr	5	\$2,650.00
7/6/2023	Call with J. Kuhns concerning mediation issues.	Nagi, Jason A.	\$550/hr	0.2	\$110.00
7/7/2023	Forward request for and review key documents for mediation (2.5); call with J. Sabin and A. Currie re Ponzi and mediation settlement (1.0); set up call with Steering committee re same (.1); review summary re assets and liabilities per Celsius entities (.4); review motion re approval of DS and setting deadlines (.5); call with I. Hermann re stay appeal and settlement limited objection options (.5)	Kuhns, Joyce A.	\$530/hr	5	\$2,650.00
7/7/2023	Call with J. Kuhns concerning mediation (.6); call with J. Sabin, A. Curry and J. Kuhns re mediation positions (.8); call with J. Kuhns re same (.7)	Nagi, Jason A.	\$550/hr	2.3	\$1,265.00
7/9/2023	Review draft mediation materials (2.0); outline adversary for Ponzi and Retail borrowers (.5); summarize call with J. Sabin and mediation positions (.5); call with J. Nagi re same (.7); circulate to Steering Committee for call (.3)	Kuhns, Joyce A.	\$530/hr	4	\$2,120.00
7/10/2023	Draft vendor agreement re D. Frishberg (.3); status call with Steering Committee re mediation (1.5); call with J. Sabin re same and positions (1.0); commence drafting mediation settlement statement and related settlement statement (3.2)	Kuhns, Joyce A.	\$530/hr	6	\$0.00
7/10/2023	Call with I. Hermann, B. Perry, N. Farr and J. Kuhns concerning mediation posture and related issues.	Nagi, Jason A.	\$550/hr	1.6	\$880.00
7/10/2023	Call with J. Kuhns concerning structure & outline of mediation statement and confidential settlement memo.	Nagi, Jason A.	\$550/hr	0.9	\$495.00
7/11/2023	Call with J. Kuhns re legal research	Horowitz, Leslie R.	\$570/hr	0.3	\$171.00
7/11/2023	Research issue of setoff	Horowitz, Leslie R.	\$570/hr	0.7	\$399.00
7/11/2023	Email to J. Kuhns re setoff research	Horowitz, Leslie R.	\$570/hr	0.1	\$57.00
7/11/2023	Research issue of substantive consolidation	Horowitz, Leslie R.	\$570/hr	1.4	\$798.00
7/11/2023	Email and call to J. Kuhns with results and analysis of legal research re mediation issues	Horowitz, Leslie R.	\$570/hr	0.4	\$228.00
7/11/2023	Call with J. Kuhns re substantive consolidation and plan confirmation issues	Horowitz, Leslie R.	\$570/hr	0.4	\$228.00
7/11/2023	Email to J. Kuhns with case law analysis	Horowitz, Leslie R.	\$570/hr	0.3	\$171.00
7/11/2023	Call with S. Dixon and D. Kahn re mediation and position (.7); call with J. Nagi, J. Sabin and A. Currie re mediation and position (.8); work on mediation and settlement statements and circulate for comments (5.2); (2) calls with L. Horowitz re set off and 1129 research (.8); review cases; call and emails with chambers re lists and cells for mediation (.2); emails with C. Crews re mediation call (.3)	Kuhns, Joyce A.	\$530/hr	8	\$4,240.00
7/11/2023	Call with S. Dixon and J. Kuhns re mediation settlement issues.	Nagi, Jason A.	\$550/hr	0.7	\$385.00
7/11/2023	Call with J. Sabin, A. Currie and J. Kuhns re mediation issues.	Nagi, Jason A.	\$550/hr	0.8	\$440.00
7/11/2023	Call with J. Kuhns re revising mediation statement based on calls with S. Dixon and J. Sabin.	Nagi, Jason A.	\$550/hr	0.5	\$275.00

<u>Date</u>	<u>Services</u>	<u>Timekeeper</u>	<u>Rate</u>	<u>Hours</u>	<u>Amount</u>
7/12/2023	Work on mediation statement and settlement statement (6.0); calls with A. Currie re same; call from J. Sabin re same (.2); call with J. Nagi re same (.4); review I. Hermann comments (.5); revise and recirculate (1.0); call with I. Hermann re same (.5); review second circuit law re per plan versus per debtor treatment (.5); emails from D. Latona re filing protocol (.2); forward mediation and settlements to chambers (.2); forward mediation statement to group and to Steering Committee with comments (.5)	Kuhns, Joyce A.	\$530/hr	10	\$5,300.00
7/12/2023	Review and revise mediation statement and settlement statement. Review mediation statements and related materials (1.5); call with C. Crews and J. Nagi re mediation (1.0); review and emails to the group re indictments, etc. (.5)	Nagi, Jason A.	\$550/hr	2.1	\$1,155.00
7/13/2023	Call with C. Crews and J. Kuhns in advance of mediation.	Kuhns, Joyce A.	\$530/hr	3	\$1,590.00
7/13/2023	Call with J. Kuhns concerning indictment, SEC Complaint, FTC Complaint and settlement (.3); review same (.3); and draft email to D. Kay, white collar lawyer concerning effect on estate (.3)	Nagi, Jason A.	\$550/hr	1	\$550.00
7/13/2023	Call with J. Nagi and J. Kuhns re effects of indictments	Ruvoldt, Harold J.	\$750/hr	0.9	\$495.00
7/13/2023	Review SEC, FTC, and CFTC and DOJ/USAG SDNY complaints and related non-prosecution letters, stips and statement of facts (1.5); emails with D. Gordon and H. Waddell re joining ad hoc (.4); emails to group re assignments and summaries of Earn internet chatter for mediation (1.5); email and call with H. Ruvoldt and J. Nagi re impact if any of regulator and DOJ actions on bankruptcy case (.8); assemble materials for mediation (2.2); emails with D. Latona re mediation (.2)	Kuhns, Joyce A.	\$530/hr	0.8	\$600.00
7/14/2023	Review DOJ non-prosecution agreement and exhibit re Debtor admissions (1.0); follow up email to white collar expert re analysis of charges and admissions (.2)	Nagi, Jason A.	\$550/hr	6.6	\$3,498.00
7/14/2023	Review email from B. Perry re outreach from S. Duffy and Fahrenheit call (.4); call with K. Wofford at White and Case re same (.8); review summaries (.8)	Nagi, Jason A.	\$550/hr	1.2	\$660.00
7/15/2023	Call with K. Wofford re Fahrenheit and Earn versus borrower positions in mediation	Kuhns, Joyce A.	\$530/hr	2	\$1,060.00
7/15/2023	Emails with A. Carty re setting up Fahrenheit/Ad Hoc call (.3); travel to NYC (5.7); call with I. Hermann re opening positions (1.0); attend Fahrenheit/Ad Hoc pre-mediation call (1.0)	Kuhns, Joyce A.	\$530/hr	1	\$530.00
7/16/2023	Review SEC v. XRP decision granting partial summary judgment re digital assets sold to public via third parties and consider its effect on Celsius case.	Kuhns, Joyce A.	\$530/hr	8	\$4,240.00
7/16/2023	Call with J. Kuhns concerning tomorrow's mediation.	Nagi, Jason A.	\$550/hr	1.5	\$825.00
7/16/2023	Attend meeting between Fahrenheit and Earn ad hoc group.	Nagi, Jason A.	\$550/hr	0.5	\$275.00
7/17/2023	Strategize with group (1.0); attend mediation (10.0); postmediation recap with group (1.0)	Nagi, Jason A.	\$550/hr	1.3	\$715.00
7/17/2023	Attend mediation with debtor, committee and loans group.	Kuhns, Joyce A.	\$530/hr	12	\$6,360.00
7/18/2023	Preparation for mediation (1.0); attend Celsius hearing (1.5); attend mediation (8.5); post mediation recap with group (1.5)	Nagi, Jason A.	\$550/hr	10	\$5,500.00
7/18/2023	Review term sheet circulated by Debtor (.2); review Earn-Borrower recovery analysis (.2)	Kuhns, Joyce A.	\$530/hr	12.5	\$6,625.00
7/19/2023	Premeditation group meeting (1.0); attend mediation (8.0); travel to Wilmington (delayed) (4.5); recap for group (1.5)	Nagi, Jason A.	\$550/hr	0.4	\$220.00
7/19/2023	Emails with J. Sabin re LOC/Ad Hoc prospects	Kuhns, Joyce A.	\$530/hr	15	\$7,950.00
7/19/2023	Call with J. Kuhns concerning mediation negotiations and comments/limitations from Debtor and expense reimbursement part of term sheet agreement.	Kuhns, Joyce A.	\$530/hr	0.2	\$106.00
7/20/2023	Update call with J. Nagi re PSA (.7); call Ad Hoc re twitter spaces and roll out (1.5); set up call with Steering Committee and mediation attendees re Twitter Spaces follow on (.4); review revised term sheet (.5); review settlement motion (1.0); circulate to group (.2); emails to Ad Hoc on status re loan outreach to third party servicer (.7)	Nagi, Jason A.	\$550/hr	0.5	\$275.00
		Kuhns, Joyce A.	\$530/hr	5	\$2,650.00

<u>Date</u>	<u>Services</u>	<u>Timekeeper</u>	<u>Rate</u>	<u>Hours</u>	<u>Amount</u>
7/20/2023	Discussion with J. Kuhns concerning plan support agreement.	Nagi, Jason A.	\$550/hr	0.7	\$385.00
7/21/2023	Call with Steering Committee and mediation Earn attendees (1.5); discuss LOC and board positions and cv's with B. Perry and I. Hermann (1.0); review and forward PSA with comments to Debtor and Committee (1.5)	Kuhns, Joyce A.	\$530/hr	4	\$2,120.00
7/21/2023	Call with J. Kuhns Earn ad hoc group re settlement issues.	Nagi, Jason A.	\$550/hr	1	\$550.00
7/22/2023	Call with and revise I. Hermann LOC cv; call with B. Perry and revise board cv; forward to Debtors and UCC counsel; review and comment on and circulate the PSA	Kuhns, Joyce A.	\$530/hr	4	\$2,120.00
7/23/2023	Call with J. Nagi re PSA changes (.5); emails to Steering Committee re positions (.3); email to Debtor and UCC counsel re same (.2)	Kuhns, Joyce A.	\$530/hr	1	\$530.00
7/23/2023	Call with J. Kuhns reviewing plan support agreement and terms sheet. Draft and send email to entire Ad Hoc Group explaining and attaching term sheet (1.5); set up Ad Hoc call for 7/25 and Twitter Spaces call for 7/26 (.1); review PSA (.2); call with Venable re PSA (.8); redline same and collate comments (.5); continue to review additional Ad Hoc comments (.5); collate again (.4); emails re board cvs with prospects from Earn group (.2)	Nagi, Jason A.	\$550/hr	1.7	\$935.00
7/24/2023	Calls with J. Kuhns re Plan Support Agreement issues and review sections of same	Kuhns, Joyce A.	\$530/hr	4.2	\$2,226.00
7/24/2023	Call with Earn Ad Hoc group re terms sheet and plan support agreement.	Nagi, Jason A.	\$550/hr	1.5	\$825.00
7/24/2023	Call with J. Nagi re revisions to PSA (.6); review draft from J. Sabin (.4); call with J. Sabin re same (.7); further review comments from Venable (.5); further revise PSA (1.0); respond to Ad Hoc comments (.5); emails with counsel for Debtors and UCC re PSA and its ETA and further revise same (3.0); emails with Committee re twitter spaces call (.2); emails with G. Sutton re share prices (.8); review and reply to cvs for LOC and NewCo board (.3)	Nagi, Jason A.	\$550/hr	1.6	\$880.00
7/25/2023	Substantive review of Plan Support Agreement and Term sheet with J. Kuhns (3.9); revisions to same (1.0)	Kuhns, Joyce A.	\$530/hr	8	\$4,240.00
7/25/2023	Review and revise PSA (2.0); continue to collate all comments (2.0); call with J. Sabin re Tuganov comments (1.0); forward same to Debtors and UCC and Borrower Ad hoc counsel (.5); call and emails among group re comments (2.0)	Nagi, Jason A.	\$550/hr	4.9	\$2,695.00
7/26/2023	Call with Earn Ad Hoc group in preparation for Twitter Spaces (1.7); numerous revisions to Plan Support Agreement with counsel for Tuganov (1.0); review numerous emails from Debtor objecting to our comments and Earn group re same (.5); call with J. Kuhns concerning response to email traffic from ad hoc group, Debtor and UCC (1.0); prep for and attend Twitter Spaces call with Earn re status of term sheet (2.5)	Kuhns, Joyce A.	\$530/hr	7.5	\$3,975.00
7/26/2023	Review plan of reorganization re security issues	Nagi, Jason A.	\$550/hr	6.7	\$3,685.00
7/27/2023	Review and respond to comments on Figure deal	Sutton, Gregory W.	\$530/hr	1.3	\$689.00
7/27/2023	Review plan and disclosure statement; calls with J. Kuhns re same.	Kuhns, Joyce A.	\$530/hr	0.3	\$159.00
7/27/2023	Call with sponsor counsel re: equity and SEC issues	Nagi, Jason A.	\$550/hr	2.9	\$1,595.00
7/27/2023	Review changes to PSA (.7); call from A. Kolodny re PSA and related matters (.6); review emails re Borrower status re term sheet and PSA (.6); review and distribute revised amended plan and DS (1.2); review emails re Earn constituent and Figure deal (1.0); review Venable comments to PSA (.7); set up Ad Hoc call for 7/31 with agenda (.2)	Sutton, Gregory W.	\$530/hr	1.1	\$583.00
7/28/2023	Review plan and DS and notes on PSA.	Kuhns, Joyce A.	\$530/hr	5	\$2,650.00
7/28/2023	Call with J. Nagi and K. Khanuja re next steps (.8); attend Steering Committee and mediation participant call (1.7); review Figure waterfall (.5); review DS comments (1.2); review emails exchanges between C. Koenig and D. Adler re borrower position re PSA and term sheet (.3)	Nagi, Jason A.	\$550/hr	1.4	\$770.00
7/31/2023	Call with Ad Hoc group (1.7); call with K. Khanuja and J. Kuhns concerning plan, DS (.8)	Kuhns, Joyce A.	\$530/hr	4.5	\$2,385.00
7/31/2023	Review DS (3.0); commence draft of Reservation of Rights (1.0)	Nagi, Jason A.	\$550/hr	2.5	\$1,375.00
8/1/2023		Kuhns, Joyce A.	\$530/hr	4	\$2,120.00



<u>Date</u>	<u>Services</u>	<u>Timekeeper</u>	<u>Rate</u>	<u>Hours</u>	<u>Amount</u>
8/1/2023	Collate topics to be discussed with Ad Hoc (.5); attend Ad Hoc call (1.5)	Kuhns, Joyce A.	\$530/hr	2	\$1,060.00
8/1/2023	Call with Earn Ad Hoc group (1.3); calls with J. Kuhns (.2); call with Arie Peled, counsel for Tuganov concerning PSA and DS (.3); analyze term sheet provided by Figure (.8).	Nagi, Jason A.	\$550/hr	2.6	\$1,430.00
8/2/2023	Review Venable PSA comments (.4); call with A. Peled re same (.3); attend Ad Hoc call re objections to DS and status of PSA (1.5); work on Reservation and collate comments (1.0); review UCC support letter and emails with group re same (.5)	Kuhns, Joyce A.	\$530/hr	3.7	\$1,961.00
8/2/2023	Numerous calls with J. Kuhns re issues to include in reservation of rights (1.0); calls with D. Kahn re liquidation analysis (1.0); work on draft reservation of rights (3.6)	Nagi, Jason A.	\$550/hr	5.6	\$3,080.00
8/2/2023	Call with J. Kuhns and J. Nagi regarding potential federal income tax issues for Earn Account claimholders with respect to debtor's proposed plan of reorganization.	Tippett, Scott K.	\$470/hr	0.5	\$235.00
8/3/2023	Call with J. Nagi re changes to Reservation of Rights and changes requested from Ad Hoc (.6); follow on call with J. Nagi before finalizing (.4)	Kuhns, Joyce A.	\$530/hr	1	\$530.00
8/3/2023	Revisions to reservation of rights, including numerous calls with J. Kuhns, I. Hermann and D. Kahn while working on draft.	Nagi, Jason A.	\$550/hr	5.5	\$3,025.00
8/3/2023	Review disclosure statement regarding potential federal income tax issues for Earn Account claimholders.	Tippett, Scott K.	\$470/hr	2.7	\$1,269.00
8/4/2023	Catch up call with Ad Hoc and Bank to the Future (1.0); call with J. Sabin re PSA and status of Ad Hoc (.5); review email from C. Koenig re Reservation of Rights re DS (.4); email with B. Perry re top 50 call (.3); email with D. Frishberg re members of UCC who are Earn account holders (.5); review objections to DS by UST and regulators and others (1.7); email with S. Tippett re tax issues and forward materials to review (1.6)	Kuhns, Joyce A.	\$530/hr	6	\$3,180.00
8/4/2023	Prepare for call with Ad Hoc group (.6); call with Earn ad hoc group (1.1); review emails from Debtor on case negotiations (.2); call to D. Adler concerning case (.1).	Nagi, Jason A.	\$550/hr	2	\$1,100.00
8/4/2023	Review proposed plan and disclosure statement regarding possible federal income tax issues for Earn Account claimholders.	Tippett, Scott K.	\$470/hr	2.2	\$1,034.00
8/7/2023	Attend Ad Hoc Earn call (2.0); emails with C. Koenig re Reservation of Rights issues (.3); call with S. Tippett re tax language/involuntary conversion concept (1.0); review emails with Ad Hoc re board/governance issues and review valuation issues (2.0); request call with Debtors and committee (.2); call with A. Kolodny re Reservation of Rights issues (.3)	Kuhns, Joyce A.	\$530/hr	5.8	\$3,074.00
8/7/2023	Call with J. Kuhns and J. Nagi regarding tax issues with debtor's proposed plan (1.0); review tax federal income tax aspects of structure distribution under plan (1.2)	Tippett, Scott K.	\$470/hr	2.2	\$1,034.00
8/8/2023	Attend Earn Ad Hoc call (1.5); commence review of amended Plan and DS (2.5); continue work on Reservation of Rights issue resolution (1.0); call with S. Tippett (.2)	Kuhns, Joyce A.	\$530/hr	5.2	\$2,756.00
8/8/2023	Analysis of remaining issues in order to work out disclosure statement reservation of rights (1.0); call with Earn Ad Hoc Group re DS reservation and workouts (1.5); numerous emails and calls with S. Tippet and J. Kuhns re tax treatment (1.0); work on draft declaration from S. Dixon re support of Earn Reservation of Rights (.7)	Nagi, Jason A.	\$550/hr	4.2	\$2,310.00
8/8/2023	Review disclosure statement regarding tax issues and email J. Kuhns and J. Nagi regarding the same (2.0); call with J. Kuhns and J. Nagi regarding the same (1.0); call with counsel for creditor's committee regarding tax issues and concerns with debtor's proposed plan (.5); review tax guidance regarding issues raised by counsel for the creditors' committee (.5); conference with J. Kuhns and J. Nagi regarding the same (.2); review emails regarding the same and reply re disclosure statement (.9).	Tippett, Scott K.	\$470/hr	5.1	\$2,397.00

<u>Date</u>	<u>Services</u>	<u>Timekeeper</u>	<u>Rate</u>	<u>Hours</u>	<u>Amount</u>
8/9/2023	Emails with A. Kolody re setting up call with Debtor and committee advisors (.5); accumulate and forward questions from Ad Hoc (1.5); emails with Ad Hoc re twitter use and comments (1.0); draft supplement to Reservation of Rights and circulate for comment (1.0); review comments to same (.5); attend Steering committee call re continued areas of concern (2.5); commence review of omni replies from Debtors and committee for call (1.0)	Kuhns, Joyce A.	\$530/hr	8	\$4,240.00
8/9/2023	Meeting with Ad Hoc Group re negotiations with UCC and debtor (1.3); review objection filed by UCC (.4); review and comment supplemental reservation of rights (.7); emails and calls re set-up of meetings between UCC heads and advisors and Ad Hoc Earn Group (.7).	Nagi, Jason A.	\$550/hr	3.1	\$1,705.00
8/10/2023	Review amended plan and disclosure statement and exhibits (2.5); review omni replies from Debtors and committee (1.0); confirm calls with committee (.2); attend call with Debtors, committee advisors and counsel (2.0); follow up call with Steering Committee (2.0); set up call and send status email to Ad Hoc and review comments (1.0); set up Fahrenheit call with A. Carty (.3)	Kuhns, Joyce A.	\$530/hr	9	\$4,770.00
8/10/2023	Call with J. Kuhns concerning upcoming meeting with UCC and Debtor (.7); review issues (1.0); call with UCC, Debtor re open issues (1.0)	Nagi, Jason A.	\$550/hr	2.7	\$1,485.00
8/11/2023	File supplement to reservation of rights and comments to revised disclosure statement (.4); email same to service list, prepare certificate of service re same and file (.4)	Cohen, Rona J.	\$180/hr	0.8	\$132.00
8/11/2023	Prep for call with Committee (1.0); call with committee and Earn Steering Committee and mediation attendees (2.8); draft supplement to Reservation of Rights and circulate for approval (1.0); run call with Ad Hoc (1.5); call with Fahrenheit re open issues/governance (1.0); call with A. Kolody and J. Nagi re call with Fahrenheit and Supplement to Reservation of Rights (.5); authorize filing and service (.3); amend rule 2019 statement (1.0); emails with new members re info for statement (.5); emails with S. Dixon re support letter and uploading to blog (.4)	Kuhns, Joyce A.	\$530/hr	10	\$5,300.00
8/11/2023	Conference call with UCC, its counsel, Earn steering committee concerning governance issues.	Nagi, Jason A.	\$550/hr	2.8	\$1,540.00
8/11/2023	Work on revisions to supplement of reservation of rights.	Nagi, Jason A.	\$550/hr	0.5	\$275.00
8/11/2023	Call with full Earn Ad Hoc Group re disclosure statement.	Nagi, Jason A.	\$550/hr	1.3	\$715.00
8/11/2023	Call with larger Ad Hoc group.	Nagi, Jason A.	\$550/hr	1.6	\$880.00
8/11/2023	Call with Fahrenheit and post-call discussion with J. Kuhns re issues.	Nagi, Jason A.	\$550/hr	1.5	\$825.00
8/13/2023	Call with A. Colodny re Disclosure Statement hearing and ad hoc statement	Kuhns, Joyce A.	\$530/hr	0.3	\$159.00
8/14/2023	Review updated agenda and supplements (.5); prep for and attend hearing on disclosure statement and class action approval (1.2); follow on call with Ad Hoc re updates and scheduling of roll out and questions/responses re same (2.0); collate and respond to questions re plan (2.3)	Kuhns, Joyce A.	\$530/hr	6	\$3,180.00
8/14/2023	Attend court hearing on the disclosure statement (2.7); call with J. Kuhns concerning next steps, board process (.3)	Nagi, Jason A.	\$550/hr	3	\$1,650.00
8/15/2023	Call with J. Sabin; et al. re open issues (.5); email to A. Colodny re roll out of DS (.3); email to ad hoc members re status and next update call (1.1); email from G. Pesce re NewCo board interviews (.3); emails to prospects (.5); forward contact info (.3); review DS changes (1.0); outline questions for ad hoc (1.0)	Kuhns, Joyce A.	\$530/hr	5	\$2,650.00
8/15/2023	Call with J. Sabin, counsel for Ignat Tuganov re disclosure statement (.5); consider issues related to roll out of disclosure statement and board appointment process (.7)	Nagi, Jason A.	\$550/hr	1.2	\$660.00
8/16/2023	Resume status call with J. Sabin, et al. re open questions (.3); call with A. Colodny re roll out (.3); emails to ad hoc scheduling call and roll out (.5); review ballot re questions (1.4); call with I. Hermann re Newco board interview (.5)	Kuhns, Joyce A.	\$530/hr	3	\$1,590.00

<u>Date</u>	<u>Services</u>	<u>Timekeeper</u>	<u>Rate</u>	<u>Hours</u>	<u>Amount</u>
8/16/2023	Continued telephone call with J. Sabin and A. Currie concerning disclosure statement, ballot and other issues to consider in relation to Earn creditor body.	Nagi, Jason A.	\$550/hr	0.5	\$275.00
8/17/2023	Call with Ad Hoc Steering Committee re next steps and timing and roll out (1.0); emails re and revisions to Rule 2019 (.8); review order approving fourth amended DS and changes re same (1.5); revise notice of important dates (.2); email to Ad Hoc re next calls and solicitation questions (1.0)	Kuhns, Joyce A.	\$530/hr	4.5	\$2,385.00
8/21/2023	Call with J. Kuhns re attorneys' fees issues under § 503(b) (1.0); research re same (3.2)	Horowitz, Leslie R.	\$570/hr	4.2	\$2,394.00
8/21/2023	Call with L. Horowitz re substantial contribution application and what is compensable	Kuhns, Joyce A.	\$530/hr	1	\$530.00
8/21/2023	Follow up with I. Hermann re NewCo board interview	Kuhns, Joyce A.	\$530/hr	0.4	\$212.00
8/22/2023	Research and analysis of attorneys' fees (.7); draft memorandum re committee's attorneys' fees for individual member (2.1); draft Memorandum for OK fees (1.2)	Horowitz, Leslie R.	\$570/hr	4	\$2,280.00
8/22/2023	Start substantial contribution application and case review (1.0); status call with J. Sabin re same (.5)	Kuhns, Joyce A.	\$530/hr	1.5	\$795.00
8/23/2023	Review cases re 503(b) attorneys' fees	Horowitz, Leslie R.	\$570/hr	0.6	\$342.00
8/23/2023	Accumulate Fahrenheit questions from Ad Hoc	Kuhns, Joyce A.	\$530/hr	1	\$530.00
8/24/2023	Email from J. Kuhns re substantial contribution issues (.2); email memorandums to J. Kuhns with comments (.5)	Horowitz, Leslie R.	\$570/hr	0.7	\$399.00
8/25/2023	Emails with A. Carty re Fahrenheit updates (.2); emails with Ad Hoc members re ballots and confirmation schedule (.2); follow on email to ad hoc group re Zoom calls to answer questions re ballot (.2)	Kuhns, Joyce A.	\$530/hr	0.6	\$318.00
8/28/2023	Work on substantial contribution application (2.6); review composition of ad hoc and new members (.4)	Kuhns, Joyce A.	\$530/hr	3	\$1,590.00
8/29/2023	Call with A. Carty re Fahrenheit progress and townhall (.5); review and request committee expenses (1.5); commence exhibits (1.0)	Kuhns, Joyce A.	\$530/hr	3	\$1,590.00
8/29/2023	Call with A. Carty re Fahrenheit/Debtor negotiations on management agreement.	Nagi, Jason A.	\$550/hr	0.5	\$275.00
8/30/2023	Emails with Steering Committee re new member (.4); call with J. Lehrfeld re same and forward packet (1.0); continue to accumulate member expenses (.5)	Kuhns, Joyce A.	\$530/hr	1.9	\$1,007.00
8/31/2023	Call with J. Lehrfeld re Steering Committee (.3); highlight ballot for Zoom call (.4); finalize comments and set up Zoom call with Ad Hoc to review attached highlighted ballot (.5); emails with Ad hoc member R. Gallagher re expense questions for application (.3)	Kuhns, Joyce A.	\$530/hr	1.5	\$795.00
9/1/2023	Emails with J. Lehrfeld re NDA, Bylaws and joining the Steering Committee of Ad Hoc (.3); review and revise exhibits for substantial contribution application and expenses and confirm expenses with ad hoc members (2.5)	Kuhns, Joyce A.	\$530/hr	2.8	\$1,484.00
9/4/2023	Email with J. Lehrfeld re execution of documents for Steering Committee (.1); email with R. Gallagher re expenses for substantial contribution application (.1); email with G. Pesce re LOC issue call (.1)	Kuhns, Joyce A.	\$530/hr	0.3	\$159.00
9/5/2023	Call with A. Colodny and G. Pesce re LOC candidates (.5); call with J. Sabin re Ad Hoc position, PSA, status of NewCo (.5); review ballot and outline walk through (.5)	Kuhns, Joyce A.	\$530/hr	1.5	\$795.00
9/6/2023	Preparation for and lead Ad Hoc Zoom review of a ballot and answer questions re same (2.0); cumulate and forward to Kirkland questions from call re same and Plan distributions (.5); call with A. Colodny and G. Pesce re candidates for NewCo board and litigation oversight committee (.5); emails with Kirkland and White and Case and UST re modifying substantial contribution submission schedule (.2)	Kuhns, Joyce A.	\$530/hr	3.2	\$1,696.00
9/6/2023	Call with J. Kuhns re ballot review with ad hoc group (.6); video meeting with ad hoc group re ballot and voting (1.5); call with J. Kuhns re substantial contribution and confirmation issues and timing (.7)	Nagi, Jason A.	\$550/hr	2.8	\$1,540.00

<u>Date</u>	<u>Services</u>	<u>Timekeeper</u>	<u>Rate</u>	<u>Hours</u>	<u>Amount</u>
9/7/2023	Review CEL submissions by UCC (1.0); email to and from A. Gulic at White and Case re missing Earn solicitation packets (.2); collate and submit open Ad hoc questions to Kirkland (.5)	Kuhns, Joyce A.	\$530/hr	1.7	\$901.00
9/8/2023	Call with A. Colodny and G. Pesce re board composition and UCC position (.6); review responses from Kirkland re board seats, PayPal distributions and forward to Ad Hoc (1.0); review Third Notice of Plan Supplement (1.5)	Kuhns, Joyce A.	\$530/hr	3.1	\$1,643.00
9/11/2023	Review voicemail from Ad Hoc members re Crpto Yolo outreach (.3); set up and attend Ad Hoc status call re open issues (1.5)	Kuhns, Joyce A.	\$530/hr	1.8	\$954.00
9/11/2023	Call with Earn Ad Hoc Group. Review and forward UCC position on seats and acceptable candidate list (.3); attend call with C. Koenig, A. Colodny, G. Pesce; and J. Nagi re open Ad Hoc issues (.5); attend Ad Hoc call to discuss current status of board and LOC seat and going forward strategies (1.5); review and revise and forward to White and Case Ad Hoc questions re NewCo bylaws and certificate of incorporation (1.0)	Nagi, Jason A.	\$550/hr	1.5	\$825.00
9/12/2023	Attend portion of call with counsel for UCC and Debtor (.2); calls with J. Kuhns and call J. Lehrfeld in advance of Ad Hoc call re agenda (.6); call with Ad Hoc group (1.0); call with D. Adler and J. Kuhns re PSA matters (.3)	Kuhns, Joyce A.	\$530/hr	3.3	\$1,749.00
9/12/2023	Next step call re Ad Hocs with D. Adler and J. Nagi (1.0); call with UCC and counsel and Ad Hoc and counsel to share process and positions on governance and seats (2.0); follow on call with steering committee re same and recommendations (1.5); email to Ad hoc re same and to set up call (.5); review stipulation re stay of equitable subordinated claims proceeding (.3)	Nagi, Jason A.	\$550/hr	2.1	\$1,155.00
9/13/2023	Call with D. Adler and J. Kuhns concerning plan support issues (1.0); call with J. Kuhns re upcoming hearing and UCC position re board seats (.3)	Kuhns, Joyce A.	\$530/hr	5.3	\$2,809.00
9/13/2023	Attend Ad Hoc call re updates on open governance issues (1.9); review Fahrenheit transcripts re representations on board (.6); call with A. Colodny re ad hoc position (.6); review board observer agreement (.5); draft reservation of rights as requested and circulate for comment to ad hoc (1.2); review Crypto Yolo emails and re UCC position on board seats (.4); review UCC responses to NewCo by laws and certificate questions and forward to ad hoc (.4); review emails from ad hoc members interested in board observer seats if offered (.4)	Nagi, Jason A.	\$550/hr	1.3	\$715.00
9/14/2023	Call with Ad Hoc re governance.	Kuhns, Joyce A.	\$530/hr	6	\$3,180.00
9/14/2023	Call with B. Perry and UCC and counsel and S. Dixon and counsel re governance issues (.6); follow on call with B. Perry (.4); two calls with C. Manderson re S. Dixon positions re board and observer agreement (.5); call with steering committee re governance position (1.0); draft and send status email and request for positions to Ad Hoc members (.5); review individual replies re same (1.0); draft and send clarification to group (.5); call with J. Nagi re same (.5)	Nagi, Jason A.	\$550/hr	1.9	\$1,045.00
9/15/2023	Status call with A. Colodny re Ad hoc position on NewCo board (.4); emails and call with B. Perry re same (.4); call with J. Nagi re status of case and Ad Hoc positions (.4)	Kuhns, Joyce A.	\$530/hr	5	\$2,650.00
9/16/2023	Review Ad Hoc comments to PSA and board observer agreement (1.0); call with S. Cornell and M. Bruh re substantial contribution format and possible extensions (.5); emails with substantial contribution group re extension through October 2 and follow on consents with group (.6); call with I. Hermann re LOC issues and candidates (1.0); review position emails from Ad Hoc re governance issues (1.0); call with C. Manderson, et al. re S. Dixon issues and solutions (1.0); convene Steering Committee (1.2); convene Ad Hoc re recommendations of Steering Committee (1.5); call with A. Colodny re board observer seats and interviews and Ad Hoc position on LOC seat (.5); advise candidates re status of same (.5); call with A. Colodny, et al. and C. Manderson re PSA and Board Observer issues (1.0)	Kuhns, Joyce A.	\$530/hr	1.2	\$636.00
9/18/2023		Kuhns, Joyce A.	\$530/hr	9.8	\$5,194.00

<u>Date</u>	<u>Services</u>	<u>Timekeeper</u>	<u>Rate</u>	<u>Hours</u>	<u>Amount</u>
9/18/2023	Call with Steering Committee (.7); call with Ad Hoc Group, S. Dixon, and his new counsel (1.0). Review status of board observer cv's and confirm list with Ad Hoc (1.5); call with C. Crews re accepting LOC/Earn slot (.4); advise Committee counsel of same (.2); emails with A. Colodny re open board observer seats and forward cv's (.4); call with J. Lehrfeld re interview re same (.5); email proposing language to address term issues in Board Observer Agreement to C. Manderson, et al. (.5); call with C. Manderson re PSA and board observer issues ( 1.0); review changes re same (.5); call with A. Colodny re board observer seats (.4); call with Committee counsel and C. Manderson re S. Dixon issues and PSA and board observer seats (1.0); review revised draft from A. Colodny (.4); comments to and call with C. Manderson, et al. (.5); review PSA next round language changes and next version from Committee counsel (1.0)	Nagi, Jason A.	\$550/hr	1.7	\$935.00
9/19/2023	Call with J. Kuhns concerning extensions of board observer positions (.5); call with J. Kuhns and C. Crews re Litigation Oversight Committee (.4); review PSA and board observer agreement and suggest revisions to same in preparation for revisions to UCC (1.2); call with S. Dixon, counsel and J. Kuhns re PSA and board observer agreement (1.0)	Kuhns, Joyce A.	\$530/hr	8.3	\$4,399.00
9/19/2023	Conference call with Ms. Kuhns re filing (.1); Conference call with Ms. Kuhns and Ms. Simundac re filing (.3); Review emails and related information (.3)	Nagi, Jason A.	\$550/hr	3.1	\$1,705.00
9/20/2023	Prepare and finalize Consenting Individual Earn Account Holder's Signature Pages to the Plan Support Agreement.	Horowitz, Leslie R.	\$570/hr	0.9	\$513.00
9/20/2023	Call with C. Manderson, et al. re changes to PSA and Board Observer Agreement (1.0); further review and revise same and call with Ad Hoc re changes and S. Dixon requests (2.0); call with counsel for Debtor, committee, Fahrenheit, I.Tuganov (1.5) call with C. Manderson, et al. re final changes to PSA and Board Observer Agreement and S. Dixon requests (1.0); review email to group re same (.3); draft signature page and chart for Ad Hoc acceptance of PSA for filing (2.0); and conform and send out and start collations of same for PSA for Ad Hoc ( 3.0)	Kuhns, Joyce A.	\$200/hr	1.8	\$360.00
9/20/2023	Call to C. Manderson re S. Dixon signatures to PSA and changes to Board Observer Agreement (1.0); review and submit final changes to PSA and Board Observer Agreement (1.0); convene Ad Hoc re authorizations (1.0); convene Steering Committee re attendees at Twitter Spaces call to support Plan (1.0); call with Committee counsel, et al. re execution and roll out of YouTube and Twitter Spaces re PSA and board observers (.3); call with K. Wolford re same (.3); continue to collect and forward Ad Hoc signatures and confirm holdings (2.0); call with I. Hermann re PSA status and individual signatures pages to PSA and obtain and forward same to committee counsel (1.0); emails to Steering Committee attendees re monitoring Twitter Spaces inquiries (1.0); Steering Committee call download re YouTube and Twitter Spaces call that ran 6 hours ( 1.0); email with S. Biswas/WSJ re PSA and board observers (.2); update Rule 2019 (1.0)	Simundac, Camille A.	\$530/hr	10.8	\$5,724.00
9/21/2023	Review S. Dixon email re twitter spaces on 9/21 (.2); set up and attend Ad Hoc call re final questions re ballots and push for acceptances/voting (1.0); replies to Earn inquiries re balloting questions and entry issues (1.1); edit (2x) Twitter email from Ad Hoc Earn promoting acceptances (.4); review plan language changes (.4); edit board observer cv for J. Lehrfeld (.4); email to J. Lehrfeld re headshot (.1); edit B. Perry board observer cv (.4); call to B. Perry re same and head shot status ( .2); review expert report of M. Galk for confirmation and reply to Earn emails re same (1.0); review and analysis of plan objections and reservations of rights and forward to Ad Hoc with comments (2.0)	Kuhns, Joyce A.	\$530/hr	10.8	\$5,724.00
9/22/2023	Review limited objection to confirmation filed by SEC (.3); call with Earn Ad Hoc Group concerning case and voting (.8)	Kuhns, Joyce A.	\$530/hr	7.2	\$3,816.00
9/22/2023		Nagi, Jason A.	\$550/hr	1.1	\$605.00

<u>Date</u>	<u>Services</u>	<u>Timekeeper</u>	<u>Rate</u>	<u>Hours</u>	<u>Amount</u>
	Call with A. Colodny, et al. re cv's and board changes (.5); email to Ad Hoc re same (.2); call with B. Perry re cv and Twitter communications/messaging				
9/23/2023		Kuhns, Joyce A.	\$530/hr	1.1	\$583.00
9/27/2023	Draft Application for Substantial Contribution and exhibits	Kuhns, Joyce A.	\$530/hr	4.0	\$2,120.00
9/28/2023	Finalize Application for Substantial Contribution and exhibits	Kuhns, Joyce A.	\$530/hr	6.0	\$3,180.00

**TIMEKEEPER SUMMARY FOR THIS MATTER**

<u>Timekeeper</u>	<u>Timekeeper Category</u>	<u>Hourly rate</u>	<u>Hours</u>	<u>Amount</u>
Jason A. Nagi	Attorney	\$550/hr	120	\$65,725.00
Joyce A. Kuhns	Attorney	\$530/hr	467	\$244,224.00
Leslie R. Horowitz	Attorney	\$570/hr	14	\$7,980.00
Scott K. Tippet	Attorney	\$470/hr	12.7	\$2,397.00
Gregory W. Sutton	Attorney	\$530/hr	2.4	\$1,272.00
Harold J. Ruvoldt	Attorney	\$750/hr	.8	\$600.00
Rona J. Cohen	Paralegal	\$180/hr	.8	\$132.00
Camille A. Simundac	Paralegal	\$200/hr	1.8	\$360.00
<b>Total:</b>			<b>618.8</b>	<b>\$326,262.00</b>
<b>Matter Total</b>				<b>\$326,262.00</b>